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August 4, 2006

Comments on EIS Scoping for the LIOWP Project  
Minerals Management Service, MS 5412  
1201 Elmwood Park Blvd.  
New Orleans, LA 70123

**Re: Comments on EIS Scoping for the LIOWP Project**

Dear Minerals Management Service:

Please accept the following comments regarding the proposed Long Island Offshore Wind Park (LIOWP). The project offers power without consumption of fossil fuels and the related environmental impacts which is an attractive benefit. However, the amount of power generated is small (1% - 2%) relative to the total needs of Long Island. Generation is dependent on presence of wind, which is unreliable and smallest in the summer months of peak power demand. Because of the unreliability, there is no reduction in the need for alternate generation capability. There are furthermore serious environmental impacts that need to be investigated and the cost benefit need to be examined carefully.

1. The windmills are unusually large and despite the location 3.5 miles offshore, will yield a pronounced visual impact for a number of miles in each direction of the 8 mile linear direction of coastline covered. Approximately 15% of the Long Island southern coastline is affected, and many would say bespoiled. The Long Island beaches are among the finest in the world and are a local and a national treasure. These beaches are heavily visited and contribute to the desirability and attractiveness of living in the region. Visitors to these beaches generate significant economic activity. The EIS should examine negative economic impacts of the proposed project, in terms of reduced desirability of the region as a place to live and reduced visitor-ship and tourism.
2. Please do a thorough economic analysis of the project that clearly presents and separates costs with and without government subsidies. The windmills will be present for many years to come, whereas government subsidies depend on policies and politics that may change. Please further present the impact of the windmills on the overall cost of generating electricity on Long Island and likely impact on rates paid by consumers for electricity.
3. Windmills are noisy. Because of the lack of development and urban activity on the coastal shoreline, inland regions several hundred feet in from the surf may have unusually low background sound levels. The acceptability of a sound intrusion depends on how it compares to the background sound level. I have measured 35 dbA as a background sound level inland mid island, 300 feet from the surf, on nearby Fire Island on a calm day. Please

assess the expected sound levels to be experienced on land from the windmills and compare them to the anticipated mid-island levels under various weather conditions.

4. As an alternative to the proposed construction, please investigate the feasibility of pricing incentives to that would reduce electric consumption by the amount to be generated by the LIOWP. Replacement incentives to eliminate less efficient refrigerators, washing machines, air conditioners, dryers and other appliances might be able to achieve equivalent or greater reduction in fossil fuel consumption. This investigation should identify the nature magnitude a of possible replacement program that would achieve the necessary savings, the degree of positive and negative price incentives to make it happen, and net cost and feasibility. It is disturbing that we are entertaining an alternative that will visually bespoil 15% of a treasured coastline for minor gains as we drive around in Sport Utility Vehicles that consume 1.5X – 2X the fossil fuel compared to alternative vehicle choices. The proposed windmills are a poor place to start in reducing fossil fuel consumption. There are alternatives with less environmental impact.
5. The potential harm to endangered and threatened wildlife may not be known with certainty until the project is constructed. A more conservative approach would be a pilot placement of one or two windmills and observation of the effects prior to construction of the larger project.
6. Please describe how the project conforms to Section 388 of the Energy Policy Act of 2005 with respect to competitive bidding and payment of revenues to the Federal Government.

Thank you for this opportunity to comment.

Sincerely yours,

Jerome Feder